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January 8, 2010

VIA OVERNIGHT MAIL

Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Filed Office
600 Wilshire Avenue, Suite 1420
Los Angeles, CA 90017

Re: Response of Pacific Scientific Energetic Materials Company to CERCLA Yosemite Creek Superfund Site § 104(e) Information Request

Dear Mr. Whitenack:

Pacific Scientific Energetic Materials Company (hereinafter, "PSEMC" or "Company"), is providing the enclosed Response to the USEPA CERCLA § 104(e) Request for Information ("RFI") dated October 15, 2009, and received by the Company on or about October 18, 2009, relating to PSEMC's facility located in Hollister, California (the"Facility") This letter and attachments are provided in a timely manner, consistent with an extension of time granted to the Company on November 12, 2009, by Mr. Craig Whitenack .

The Company has made diligent efforts to respond to the Request for Information. Current employees who might have personal knowledge of the matters addressed in the Request for Information were identified and contacted. Each response is based on the best available information and knowledge of employees and representatives. Requested documents are provided to the extent such documents were located as a result of the diligent efforts of PSEMC, given the relatively short time in which to provide a response to requests for information going back 39 years. (The facility began operations, under a former owner, in 1971.)

PSEMC has several objections concerning the Request for Information. Objections are being raised to preserve the Company's rights, however answers are provided notwithstanding, and subject to, the objections.

First, the Company objects to the time limits for responses; it has been given insufficient time to thoroughly search potentially years of available records, particularly because the facility and business have transferred ownership and control several times during the relevant time period of the Request. Changes in ownership and control may have resulted in changes in recordkeeping procedures, document retention requirements, mechanisms for sorting and storing information and, also, personnel responsible for such records has changed. As such, PSEMC currently possesses incomplete information and responsive documents regarding operation of the plant, and waste

management and disposal activities prior to its involvement in 2003. Nevertheless, this response contains responsive, non-privileged information identified as of the date of this response; if additional responsive, non-privileged information is discovered after the date of this response, PSEMC will supplement this Response.

Second, the Company objects to the Requests as being overly broad, unduly burdensome, and requesting information that is not reasonably related to the relevant time period of the operation of the Bay Area Drum site. Further, certain of the Requests seek 70 years of information; others seek 39 years of information, and seek information unrelated to the Bay Area or Yosemite sites. PSEMC also objects to the phrasing of certain of the questions in the Request for Information; some of the terms and phrases used in the Request for Information are ambiguous, vague and not defined. In addition, some of the questions call for legal conclusions. For purposes of its Response to the Request for Information, PSEMC has interpreted the requests so that they are not overly broad, unduly burdensome, requesting legal conclusions, requesting information that is either irrelevant to the stated purpose of the Request for Information, is vague or ambiguous, or is not reasonably calculated to lead to the discovery of admissible evidence of liability associated with the Bay Area Drum site or the Yosemite Creek Superfund site.

Finally, PSEMC objects to the extent that the Request for Information seeks information or documents protected by the Attorney-Client Privilege, the Attorney Work Product Doctrine, or any other available legal privilege or protection. PSEMC has responded to the Request for Information by interpreting the Request for Information as not requesting any such information or documents.

General Response

As previously discussed, the ownership and control of the facility which is the main subject of the RFI has changed over the time period relevant to the Request, and PSEMC has limited knowledge of records concerning or operations of the facility prior to 2003. The following is a narrative of PSEMC's understanding of the ownership time-line for this facility.

1971-Teledyne McCormick Selph began operations at 3601 Union Road.
1993-Teledyne McCormick Selph became a business unit of Teledyne Ryan Aeronautical when the parent company, Teledyne Incorporated, realigned the organization.
1998-Teledyne McCormick Selph was purchased by the J F Lehman Corporation.
2000-McCormick Selph Inc was purchased by Procyon Technologies Inc.
2003-McCormick Selph Inc was purchased by Pacific Scientific Energetics.
2007-McCormick Selph Inc legally changes its name to Pacific Scientific Energetic Materials Company (California) Inc.

PSEMC can confidently respond to the Requests relating to the facility for the period 2003 to the present; for information prior to that time, responses are made on the best information and belief of the Company. Documents responsive to the RFI are those currently and reasonably available to PSEMC. It is possible that information responsive to this request can be obtained by USEPA from former owners and operators of the facility.

PSEMC wishes to advise USEPA that it has a comprehensive RCRA compliance program to ensure that all wastes generated and disposed by PSEMC are, and have been, managed in strict compliance with federal, state and local requirements. Further, and to the best information and belief of the Company, prior owners and operators of the facility were also diligent about RCRA compliance.

Thus, it is expected that all wastes generated at the facility were properly disposed of in compliance with RCRA requirements.

Specific Responses[1]

Response 1: PSEMC is in the business of manufacturing aerospace systems, missiles and spacecraft products, and automotive safety, products and petroleum industry products.

Aerospace systems manufactured at the site include aircrew escape module severance, aircraft stores release, severance and removal of aircraft and helicopter canopies and helicopter blades, aircraft emergency egress, and aircrew equipment and restraint divestment by means of single point releases.

Missile and spacecraft systems include the application of ordnance technology for uses in igniting rocket motors, stage separation, terminating thrust, and the deployment of scientific equipment.

Automotive safety products include Tin and lead sheathed rapid deflagrating cord is manufactured at this site. This product transmits the initiating impulse from collision sensing devices to gas generators used in the automotive safety restraint systems (air bag systems).

Petroleum industry products include percussion initiators, pyroelectric time delays, and booster shells are manufactured at this site for a wide variety of applications in the petroleum industry.

The following is a summary of the products manufactured by PSEMC at the Facility from 2003 to Present; for time periods preceding 2003, the information presented is to the best knowledge and belief of PSEMC.

1971- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products.

1972- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products.

1973- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products.

1974- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products.

1975- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products.

1976- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products, manufacture of n-nitrosohexamethyleneimine, manufacture of n-aminohexamethyleneimine.

1977- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products, manufacture of n-nitrosohexamethyleneimine manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone.

1978- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitrosohexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone.

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[1] All responses are preceded by the Request Numbers as listed in "Enclosure B Information Request Questions."

1979- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone.

1980- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone.

1981- Aerospace Systems, Missiles and Spacecraft Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone.

1982- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone, manufacture of m-trifluoromethylbenzyl chloride, manufacture of m-trifluoromethylphenylacetonitrile, manufacture of 2,2'-diaminoazobenzene, manufacture of 2,2'-diazidoazobenzene.

1983- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone, manufacture of m-trifluoromethylbenzyl chloride, manufacture of m-trifluoromethylphenylacetonitrile, manufacture of 2,2'-diaminoazobenzene, manufacture of 2,2'-diazidoazobenzene.

1984- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone, manufacture of m-trifluoromethylbenzyl chloride, manufacture of m-trifluoromethylphenylacetonitrile, manufacture of 2,2'-diaminoazobenzene, manufacture of 2,2'-diazidoazobenzene, manufacture of 5-nitroanthranillic acid.

1985- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 3-nitro-4-methylacetophenone, manufacture of m-trifluoromethylbenzyl chloride, manufacture of m-trifluoromethylphenylacetonitrile, manufacture of 2,2'-diaminoazobenzene, manufacture of 2,2'-diazidoazobenzene, manufacture of 5-nitroanthranillic acid.

1986- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 5-nitroanthranillic acid, manufacture of 3,3'-dinitrodiphenylsulfone, manufacture of trimethyl ortho formate.

1987- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 5-nitroanthranillic acid, manufacture of oxamide manufacture of 3,3'-dinitrodiphenylsulfone, manufacture of trimethyl ortho formate, manufacture of cyanoacetamide, manufacture of malononitrile from cyanoacetamide, manufacture of 3,3'-diaminodiphenylsulfone.

1988- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 5-nitroanthranillic acid, manufacture of oxamide

manufacture of 3,3'-dinitrodiphenylsulfone, manufacture of trimethyl ortho formate, manufacture of cyanoacetamide, manufacture of malononitrile from cyanoacetamide, manufacture of 3,3'-diaminodiphenylsulfone, manufacture of 4-fluoronitrobenzene, manufacture of 4-fluoroaniline, manufacture of 4-chlorobenzonitrile, manufacture of 3-nitro-4-fluoro-N,N-bishydroxyethylaniline, manufacture of 4-chloro-3-nitrobenzonitrile, manufacture of 4-(2-hydroxyethylamino)-3-nitrobenzonitrile, manufacture of (N^1, N^4, N4-tris [2-hydroxyethyl]-2-nitro-p-phenylenediamine), manufacture of 3,3'-dinitrobenzophenone.

1989- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine, manufacture of 5-nitroanthranillic acid, manufacture of oxamide manufacture of 3,3'-dinitrodiphenylsulfone, manufacture of trimethyl ortho formate, manufacture of cyanoacetamide, manufacture of malononitrile from cyanoacetamide, manufacture of 4-fluoronitrobenzene, manufacture of 4-fluoroaniline, manufacture of 4-chlorobenzonitrile, manufacture of 3-nitro-4-fluoro-N,N-bishydroxyethylaniline, manufacture of 4-chloro-3-nitrobenzonitrile, manufacture of 4-(2-hydroxyethylamino)-3-nitrobenzonitrile, manufacture of (N^1, N^4, N4-tris [2-hydroxyethyl]-2-nitro-p-phenylenediamine), manufacture of 3,3'-dinitrobenzophenone.

1990- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine.

1991- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine.

1992- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine.

1993- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine.

1994- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products, manufacture of n-nitroshexamethyleneimine, manufacture of n-aminohexamethyleneimine.

1995- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

1996- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

1997- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

1998- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

1999- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2000- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2001- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2002- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2003- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2004- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2005- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2006- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2007- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2008- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

2009- Aerospace Systems, Missiles and Spacecraft Products, Automotive Safety Products, Petroleum Industry Products.

Response 2. The respondent, PSEMC has not conducted any business in California except at the facility at 3601 Union Road, Hollister, California 95023; such operations have only been since 2003 and are not during the relevant time period of the Request. Further PSEMC has not ever conducted operations outside of California which operations shipped drums or containers to California for the purposes set forth in Request Number 2(c). To the extent PSEMC has knowledge of the operations of previous owners and operators information responsive to this Request is set forth in elsewhere in their Response.

Response 3. See Response to No. 1, above.

Response 4. No records relating to the Facility exist prior to 1983. Records for the time frame 1983 through 1988 are limited to copies of hazardous waste manifests.

Response 5. Yes. For the period since 2003 the basis for the response is knowledge of operations; prior to that time, knowledge is based on manifests, generation notices and storage records.

Response 6. See attached "Waste Summarization Spreadsheets" and "SOI Product Data" in SOI specific folders.

- PCBs; 1983.
- Zinc Containing Waste; 1984.
- Lead and Zinc Waste; 1984.
- Lead Contaminated Solid; 1984.
- Zinc Hydroxide "A"; 1986.

- Paint Cans, Paper, Plastic (Zinc); 1987-2009.
- Lead and Zinc Contaminated Soil; 1987.
- Ash and Debris (Lead); 1988-2009.
- Paint Scrubber Waste Water (Lead and Zinc); 1989-2007.
- Zinc Hydroxide "B"; 1990.
- Paints and Thinners (Lead and Zinc); 1991-2009.
- Paint Scrubber Sludge (Lead and Zinc); 1992-2009.
- Bomb Chamber Rinse Water (Lead); 1993-2009.
- Mercury and Acid; 1993-2008.
- Heptane (Lead) 1994-2001.
- Air Filters (Lead); 1994-2008.
- Out of shelf-life/off-spec paints, Thinners, Adhesives, Epoxies and Resins (Lead and Zinc); 1994-2009.
- Vegetable Oil (Lead); 1995-2009.
- Paper, Heptane, TCE, Acetone (Lead); 1995-2009.
- Heptane and Butyl Acetate (Lead); 1995.
- Mineral Oil and Lead; 1996-2009.
- Lead Contaminated Soil (Filter Cake); 1997.
- Empty Drums (Petroleum Residue); 1999.
- Lead Contaminated Soil (TSU-1); 2000.
- Lab Pack (Barium Lead); 2004-2005.
- Mercury (Surplus); 2005.
- Soil With Hydraulic Oil; 1989

Response 7. See attached "Waste Summarization Spreadsheets" and "SOI Product Data" in SOI specific folders.

Response 8. See attached "Waste Summarization Spreadsheets" and "SOI Product Data" in SOI specific folders.

Response 9. See attached "Waste Summarization Spreadsheets" in SOI specific folders.

Response 10. Hydraulic Oils-The facility has since 2003, and continues to purchase, store, and use hydraulic oils. This oil use is related to small equipment such as bench sized presses and vehicles. The volumes used and stored would be in the range of 5-10 gallons/year. Hydraulic oils are used in a manner not typically requiring disposal.

Response 11. Hydraulic oil purchases are so few and far between they are handled on a petty cash system. The information requested does not exist. There is currently no containerized hydraulic oil on-site.

Response 12. Hydraulic Oil containers (<10 gallons) of off-the-shelf type hydraulic oils are purchased on an as-needed basis. No records exist.

Response 13. 5-10 gallons/year of hydraulic oil was/is purchased.

Response 14. See attached "Waste Summarization Spreadsheets in SOI specific folders."

Response 15.

(a) See attached "Waste Summarization Spreadsheets in SOI specific folders."

(b) In most cases, these records are not available. In some cases this is simply due to the expanse of time; further the facility has undergone changes in ownership and control that affect document retention. In other cases, this is due to the rather obscure nature of the waste and inability to link it to a specific product purchase. In many cases it is simply a matter of a very complex electronic purchasing database that does not lend itself to the reverse process of attempting to identify and associate products based on waste streams. Available records associated with zinc and lead related products are identified as "SOI Product Data" and are located in SOI specific folders. Manifests and hazardous waste generation records ("Notices" and electronic records) are contained in SOI specific folders.

(c) See "SOI Product Data" in SOI specific folders.

(d) See "Waste Summarization Spreadsheets" and "Container Summarization Spreadsheets" in SOI specific folders.

Response 16.

(a) See "SOI Product Data" in SOI specific folders.

(b) The facility is unaware of ever receiving a product in a used drum.

(c) Not-applicable.

Response 17. See "Waste Summarization Spreadsheets" in SOI specific folders.

Response 18. No records exist.

Response 19. SHC Management General: The Company is not aware of any instance related to the SOIs listed below whereby PSEMC did not own the SOI container upon receipt, nor is it aware of any instance whereby once the subject SOIs were sent to a waste management facility the SOI containers did not belong to the waste management facility. The only exception, being the 12-yard bins associated with the Lead Contaminated Soil (TSU-1).

- **PCBs; 1983**-No data available beyond containers listed in manifest.
- **Zinc Containing Waste; 1984**-No data available beyond containers listed in manifest.
- **Lead and Zinc Waste; 1984**-No data available beyond containers listed in manifest.
- **Lead Contaminated Solid; 1984**-No data available beyond containers listed in manifest.
- **Zinc Hydroxide "A"; 1986**-No data available beyond containers listed in manifest.
- **Paint Cans, Paper, Plastic (Zinc); 1987-2009**-All paint related containers were shipped to a RCRA permitted hazardous waste management facility. Records exist substantiating this practice from 1991 to present. See "Waste Summarization Spreadsheets" for specific waste disposal for wastes of which there are records.

- **Lead and Zinc Contaminated Soil; 1987-**No data available beyond containers listed in manifest.
- **Ash and Debris (Lead); 1988-2009-**Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Paint Scrubber Waste Water (Lead and Zinc); 1989-2007-**All paint related containers were shipped to a RCRA permitted hazardous waste management facility. Records exist substantiating this practice from 1991 to present. See "Waste Summarization Spreadsheets" for specific waste disposal of which there are records.
- **Zinc Hydroxide "B"; 1990-**No data available beyond containers listed in manifest.
- **Paints and Thinners (Lead and Zinc); 1991-2009-**All paint related containers were shipped to a RCRA permitted hazardous waste management facility. Records exist substantiating this practice from 1991 to present. See "Waste Summarization Spreadsheets" for specific waste disposal for wastes of which there are records.
- **Paint Scrubber Sludge (Lead and Zinc); 1992-2009**-All paint related containers were shipped to a RCRA permitted hazardous waste management facility. Records exist substantiating this practice from 1991 to present. See "Waste Summarization Spreadsheets" for specific waste disposal for wastes of which there are records.
- **Bomb Chamber Rinse Water (Lead); 1993-2009**-Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Mercury and Acid; 1993-2008-**The containers related to this waste stream were heavy duty pint sized glass flasks-more than likely original containers. Disposition of any empty containers is unknown.
- **Heptane (Lead) 1994-2001-**Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Air Filters (Lead); 1994-2008-**Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Out of shelf-life/off-spec paints, Thinners, Adhesives, Epoxies and Resins (Lead and Zinc); 1994-2009-**Contents in original containers shipped to a RCRA permitted hazardous waste management facility. See "Waste Summarization Spreadsheets" for specific waste disposal for wastes of which there are records.
- **Vegetable Oil (Lead); 1995-2009-** Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate

the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").

- **Paper, Heptane, TCE, Acetone (Lead); 1995-2009**-Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Heptane and Butyl Acetate (Lead); 1995**-No data available beyond containers listed in manifest.
- **Mineral Oil and Lead; 1996-2009**-Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Lead Contaminated Soil (Filter Cake); 1997-** -No data available beyond containers listed in manifest.
- **Empty Drums (Petroleum Residue); 1999**-No data available beyond containers listed in manifest.
- **Lead Contaminated Soil (TSU-1); 2000**-Lead received in the form of lead tubes packaged within a capped cardboard sleeve, packaged within wooden crates. The lead pipes did not contaminate the cardboard or wooden crates. The non-hazardous cardboard and crates were sent to the local sanitary landfill (commonly referred to as "John Smith Landfill").
- **Lab Pack (Barium Lead); 2004-2005**-No data available beyond containers listed in manifest.
- **Mercury (Surplus); 2005**-The containers related to this waste stream were heavy duty pint sized glass flasks-more than likely original containers.

Response 20. The following identifies personnel responsible for procurement of materials at the facility. While PSEMC does not have accurate information for periods of time prior to 2003, PSEMC nevertheless responds to the best of its knowledge, information and belief.

Employee Name	Job Title	Date in Role	Date of Resignation
Denise Bridges	Director Procurement	11/4/02 to present	
Kurt Requa	Supplier Development Specialist	8/18/08 to present	
Roger Stafford	Manager, Materials	2/5/07 to 5/19/09	5/19/09
Kurt Meir	Manager, Purchasing	10/17/94 to 9/2/05	9/2/05
Doris Crawford-Arnold	Materials Supervisor	5/18/05 to 1/15/08	1/15/08
Michael Canez	Master Scheduler	8/1/2009 to present	
Kathy Fischer	Buyer II	10/11/99 to present	
Michelle Wilson	Buyer II	10/25/08 to present	
Jerry Lundy	Buyer III	4/1/06 to present	
	Manager, Purchasing	4/20/98 to 4/1/06	
Tim Ostoja	Buyer III	6/20/95 to present	
Amelia Bautista	Buyer III	9/18/02 to present	
Gary Larson	Buyer III	10/30/06 to present	
Lisa Williamson	Buyer III	8/20/07 to present	
JR Guthrie	Buyer III	6/19/98 to 11/3/08	11/3/08

Marvin Grimsley	Buyer III	1995 to 12/16/06	12/16/06

JOB DUTIES

Buyers

A. Primary Duties and Responsibilities: (of all buyers)

1. Develops and maintains competitive sources for materials, supplies and services. Coordinates source selection decisions with other company activities as required.
2. Develops and maintains good supplier relations by adhering to high standards of business ethics and fair dealing.
3. Obtains responsive quotations from suppliers who are qualified, capable, and willing to meet company requirements.
4. Receives and evaluates proposals from potential suppliers. Develops negotiation plans, and with management approval, completes negotiations.
5. Is consistent with technical requirements, delivery schedules and sound procurement principles.
6. Expeditiously handles properly authorized emergency and rush procurements.
7. Coordinates engineering, manufacturing and quality control requirements with suppliers.
8. Documents procurement files to show that competent consideration has been given to all factors essential to effective and economical procurement.
9. Monitors and provides vendor delivery status to ensure timely receipt of materials and supplies for company programs and requirements.
10. Reviews contractual terms and conditions offered to and requested by suppliers to ensure Pacific Scientific's best interests are protected.
11. Performs clerical duties as required.
12. Keeps abreast of the market, business cycles, scarcity, and surplus conditions.
13. Follows all company Purchasing policies and procedures.
14. Good negotiating skills.
15. Perform other related duties as assigned.

Position 2 - Title - Buyer II

1. Responsibilities and duties as outlined in Section A.
2. Performs cost/price analyses to advise management of potential savings and establish negotiation goals.
3. Develops production schedule to ensure on time delivery to customer requirements are met.
4. Responsible for tracking parts from Sales Order release to shipment.
5. Initiate Material Requisitions for shortages, and re-allocate existing residual inventory as necessary and obtain approval signatures.
6. Prioritize incoming material inspection.
7. Review, approve and process changes (DAN's). This includes working with suppliers to implement changes into outstanding Purchase Orders and also the incorporation of DAN's into the

Production Release and Build Packet. Perform a complete final review of the final data packet including the test activity.

8. Perform other related duties as assigned.

Position 3 - Title - Buyer III

1. Responsibilities and duties as outlined in Section A, B1
2. Perform data analysis to develop strategies and tools to impact Quality, Delivery, Cost, (QDC), inventory turns and manufacturing lead-times. Develop and implement lean materials management systems.
3. May provide training and direction to lower level Buyers.
4. Perform other related duties as assigned.

Position 4 - Title - Strategic Buyer

1. Responsibilities and duties as outlined in Section A, B1, B2 & B3. Special focus on Strategic Purchasing at a multi-site level.
2. Perform other related duties as assigned.

Master Scheduler: Position Summary:

Determines make versus buy decisions, develops detailed Build of Materials (BOM's) and Material Resource Planning (MRP's) for program requirements, develops master schedules/program plans for functional department activities, generates material requisitions and work orders, and coordinates with Procurement and Operations to ensure program schedule commitments are attained.

Duties:

Management retains the discretion to add to or change the duties of this position at any time. The essential functions of this position include, but are not limited to, the following:

1. Develops computerized BOM/MRP's and labor estimates in response to proposal requests.
2. Reviews Master Job Release (MJR) requirements and develops a computerized master schedule/program plan to that identifies all build assemblies and corresponding quantities along with other items identified in the work breakdown structure from the MJR.
3. In concert with the team program manager and/or pricing analyst, determines make versus buy requirements for released programs based upon the negotiated proposal.
4. Coordinating with operational functional departments, creates a composite BOM for all program materials, inclusive of test and shipping requirements, for development and submission of a finalized computerized MRP to Procurement.
5. Generates material requisitions and submits requisitions, change orders. MRP's drawing packages and contractual flowdowns to Procurement.

6. Generates work orders and submits work order packages to Production Control in accordance with program schedule requirements.
7. Coordinates with Procurement, Manufacturing, and Quality Assurance to ensure completion to commitments.

Manager, Materials:

Performs contract negotiations and reviews component quality, cost, delivery, supplier service and flexibility to satisfy customer needs. Develops and implements supply-chain strategies/programs to reduce on–hand inventory levels, ensures continuous improvement in inventory reduction, cost savings, and overall materials by working with staff. Develop and execute global strategies to manage the corporate spend.

KEY RESPONSIBILITIES:

Management retains the discretion to add to or change the duties of this position at any time.

The essential functions of this position include, but are not limited to the following:

1. Lead efforts to implement monthly metrics to support company goals.
2. Establish measurements for all participating functions.
3. Works to balance the objectives of customer service and working capital.
4. Work to eliminate slow moving and excess inventory.
5. Develop cost savings strategies.
6. Responsible for Purchasing, Shipping/Receiving, and inventory control.
7. Direct procurement efforts ensuring timely delivery, superior quality and competitive pricing.
8. Responsible for planning processes.
9. Manage inventories to ensure product availability and to minimize inventory levels. This includes cycle count program, prevention of unallocated inventory growth, and continuous improvement of inventory turns.
10. Lead Danaher Materials Planning (DMP) efforts to improve operational efficiencies.
11. Ensuring the standardization and implementation of best practices across Materials functions.
12. Work with Engineering on Value Engineering Projects.
13. Monitors supplier on time delivery and quality status.
14. Reviews contractual terms and conditions offered to and requested by suppliers to ensure PacSci's best interests are protected.
15. Performs cost/price analyses to advise management of potential savings and establish negotiation goals.
16. Assists and provides guidance and training to subordinates.
17. Keeps abreast of the market, business cycles, and scarcity/surplus conditions.
18. Performs additional duties as required.

Response 21. The following describes generally wastes generated at the Facility.

- PCBs; 1983-Collection and storage unknown.
- Zinc Containing Waste; 1984-Collection and storage unknown.
- Lead and Zinc Waste; 1984-Collection and storage unknown.
- Lead Contaminated Solid; 1984-Collection and storage unknown.
- Zinc Hydroxide "A"; 1986-Collection and storage unknown.
- Paint Cans, Paper, Plastic (Zinc); 1987-2009-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Lead and Zinc Contaminated Soil; 1987-Accumulated and manually placed into containers by trained operators. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Ash and Debris (Lead); 1988-2009-Accumulated and manually placed into containers by trained operators within a covered building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Paint Scrubber Waste Water (Lead and Zinc); 1989-2007-Waste water removed from paint scrubber on an as needed basis by pumping material into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Zinc Hydroxide "B"; 1990-Specific generation and containerization unknown. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Paints and Thinners (Lead and Zinc); 1991-2009-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Paint Scrubber Sludge (Lead and Zinc); 1992-2009-Waste water removed from paint scrubber on an as needed basis by bucketing material into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Bomb Chamber Rinse Water (Lead); 1993-2009-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Mercury and Acid; 1993-2008-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Heptane (Lead) 1994-2001-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.

- Air Filters (Lead); 1994-2008-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Out of shelf-life/off-spec paints, Thinners, Adhesives, Epoxies and Resins (Lead and Zinc); 1994-2009-Accumulated and manually placed into containers by trained operators within a covered building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Vegetable Oil (Lead); 1995-2009-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Paper, Heptane, TCE, Acetone (Lead); 1995-2009 Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Heptane and Butyl Acetate (Lead); 1995-Accumulated and manually placed into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Mineral Oil and Lead; 1996-2009-Waste water removed from process equipment on an as needed basis by pumping material into containers by trained operators within a manufacturing building. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Lead Contaminated Soil (Filter Cake); 1997-Accumulated and manually placed into containers by trained operators. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Empty Drums (Petroleum Residue); 1999-Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.
- Lead Contaminated Soil (TSU-1); 2000-Material removed and placed into 12-yard bins as part of a remediation project. The covered bins were hauled directly to RCRA permitted facility.
- Lab Pack (Barium Lead); 2004-2005 Accumulated and manually placed into containers by trained operators. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility
- Mercury (Surplus); 2005-Accumulated and manually placed into containers by trained operators. Prior to 90-day accumulation, containers transported to a covered RCRA permitted hazardous waste storage facility.

(a) See "Container Summarization Spreadsheets" in waste specific folders

(b) See "Waste Summarization Spreadsheets" in SOI specific folders.

Response 22. The following describes, to the extent know, containers used to manage waste generated at the Facility.

(a) See "Container Summarization Spreadsheets" in waste specific folders.

(b) See "Container Summarization Spreadsheets" in waste specific folders.

(c) All wastes; None known.

(d) All RCRA and California wastes shipped from this facility had a hazardous waste label on them; either white with black lettering, yellow with red lettering, or yellow with black lettering. These waste containers also bore the EPA ID No. CAD009220898.

All labels had the facility address; 3601 Union Road Hollister, CA 95023 and the company name would likely have been listed as follows:

- **1971-1993**: Teledyne McCormick Selph.
- **1993-1998**: Teledyne Ryan Aeronautical McCormick Selph.
- **1998-2007**: McCormick Selph Inc.
- **2007-Present**: Pacific Scientific Energetic Materials Company (California) Inc.

(e) All wastes; Drum selection prior to 1988 can not be substantiated. The vast majority of containers used from 1988 to present have been either new or refurbished drums purchased from a commercial drum supplier. PSEMC has limited data defining specific drum use by waste in respect to containers being new or refurbished. On some occasions drums that previously contained those chemicals that were in the post production waste stream were used i.e.; Empty mineral oil drums may have been used to store mineral oil based waste. PSEMC estimates that roughly 0.5% may have been a used in this manner for the period 1988 to present. Note: PSEMC only purchased refurbished 55-gallon open top and bung top carbon steel drums and 55-gallon bung top poly drums. All other container sizes should be considered to be predominantly new.

(f) On some occasions drums that previously contained those chemicals that were in the post production waste stream were used i.e.; Empty mineral oil drums may have been used to store mineral oil based waste. We estimate that roughly 0.5% may have been a used in this manner for the period 1988 to present.

Response 23. PSEMC does not have any contracts related to past or present waste disposal facilities. All waste management disposal practices from 1988 to present have been of a customary nature, in that, with the exception of state and federal law, once the given waste was received by a RCRA permitted facility, the waste and containers became the property of the disposal facility.

Note: This would not apply to roll-off bins which would have belonged to the carrier or waste disposal company.

Response 24. While PSEMC does not have accurate information for periods of time prior to 2003, PSEMC nevertheless responds to the best of its knowledge, information and belief.

Employee Name	Job Title	Date in Role	Date of Resignation
Michelle Lowrimore	Director, Manufacturing Services	5/23/09 to present	
Dick Glover	Senior Principle Environmental Specialist	5/23/09 to present	
	Director, EHS	1/2/85 to 5/23/09	
Jack Blazer	Director Level :Data Not Available	Data Not available-MSI	Prior to 2003
Rachelle Miller	Director Level :Data Not Available	Data Not available-MSI	Prior to 2003

Edmond Lynam	Director Level :Data Not Available	Data Not available-MSI	Prior to 2003
Al Burleson	Vice President level :Data Not Available	Data Not available-MSI	Prior to 2003
Dan Carillo	Director Level :Data Not Available	Data Not available-MSI	Prior to 2003
Charlie Martin	Manager, EHS	2003 to present	
	Supervisor, EHS	4/1/92 to 2003	
	EHS Technician	4/29/85 to 4/1/92	
Miles Dyer	EHS Engineer II	2005 to 2008	5/16/08
	Manager, EHS	1998 to 2005	
Geoff Arnold	Program Manager I	12/05 to 9/06	9/15/06
	Manager EHS	7/5/2000 to 12/05	
Ernest Milhollits	Manager :Data Not Available	Data Not available-MSI	Prior to 2003
Ben Cohen	Manager :Data Not Available	Data Not available-MSI	Prior to 2003
Patty Childers	Manager :Data Not Available	Data Not available-MSI	Prior to 2003
Francis Scilacci	Manager :Data Not Available	Data Not available-MSI	Prior to 2003
Robert Strange	EHS Technician II	9/22/89 to present	
David Gonzalez	EHS Technician II	8/28/00 to present	
Craig Quinn	Environmental Technician	6/10/85 to 10/13/05	10/13/05
Patrick Mansmith	EHS Technician: Data Not Available	Data Not available-MSI	Prior to 2003
George Cabrera	EHS Technician: Data Not Available	Data Not available-MSI	Prior to 2003
Sam Dorshaw	EHS Technician: Data Not Available	Data Not available-MSI	Prior to 2003

EHS Technician:

Primary Duties and Responsibilities: (of all positions above)

Performs analysis of energetic materials operations, related physical facilities, and safety, fire and health hazards they present.

Interprets requirements of OSHA, NFPA, NRC, EPA, DOT, DOE, DTSC, BATF, ATFE, DoD etc. for management and employees.

Establishes and implements environment, health, safety and industrial/occupational hygiene compliance programs, promoting state-of-the-art safe and healthful work practices for the protection of personnel, physical assets, and production operations.

Examines operations to recognize and evaluate occupational exposure to chemical and physical agents.

Recommends and coordinates engineering and administrative controls to reduce hazards/risk and limit occupational exposure.

Interfaces with personnel regarding Process Safety Management (PSM) hazard evaluations and control methods.

On-call for emergency response and safety-related incidents.

Protects confidential and sensitive information.

Perform other related duties as assigned.

B. **Specific Duties and Responsibilities:**

Position 1 - Title - EHS Technician I

1. Responsibilities and duties as outlined in Section A.
2. Applies strategies to identify and quantify hazards, developing practical methods or programs to eliminate or control identified hazards in the work environment.
3. Investigates reported cases of occupational exposure and employee complaints of undesirable work conditions; interfaces with various departments to determine validity and possible remedies.
4. Ensures environmental compliance by performing regular inspections, conducting surveys and inventories, sampling air, wastewater and hazardous waste management, etc.
5. Reviews new processes and process changes for process safety management, environmental impact and compliance with applicable regulations.
6. Evaluates and selects new or modified environmental process or control equipment.

Position 2 - Title - EHS Technician II

1. Responsibilities and duties as outlined in Section A & Section B.
2. Conducts technical searches, evaluations and surveys to determine chemical toxicity and evaluate potential health hazards of new/existing chemicals utilized in the work place; recommends transport, storage and disposal procedures.
3. Evaluates, recommends and approves protective clothing for use at the facility.
4. Assists in performing compliance and/or liability audits of off-site transport, storage, disposal and reclaim facilities or other contractors, consultants, vendors and laboratories used by PSEMC.
5. Completes basic/routine environmental or chemical usage reports, shipping papers, and requests for data for submission to internal and external customers including government agencies.
6. Prepares basic environmental permit applications.
7. Communicates (in writing and verbally) requirements and changes in EHS regulations to site management, manufacturing and support personnel.
8. Conducts studies, laboratory analyses, and engineering experiments related to pollution control, and prevention.
9. Designs and/or directs construction of guards or other safety devices on machinery or other industrial apparatus.
10. Investigates minor safety (EHS) related events.
11. Performs informal safety inspections of work areas to determine if regulations and standards are being observed.
12. Reviews all new and modified production equipment prior to use to ensure compliance with applicable federal, state, and local regulations.

Position 3 - Title – EHS Technician III

1. Responsibilities and duties as outlined in Section A & Section B1 & B2.
2. May provide direction & training to lower lever EHS Techs.

Response 25. Yes, PSEMC has knowledge of purchased recycled drums from EP Container headquartered at 12750 Moore Street Cerritos Ca 90703

Response 26. Waste descriptions in existing manifests prior to 1988 indicate that the facility kept its wastes stream segregated.

Response 27. None known.

Response 28. None known.

Response 29. See "Waste Summarization Spreadsheets" in SOI specific folders.

Response 30. Completed as required.

Closing

PSEMC wishes to cooperate fully with the USEPA's Request for Information. If you have any questions regarding this Response, please do not hesitate to call me.

Sincerely,

Charles F. Martin
Manager, Environment Health and Safety

Enclosures

cc: Carl S. Grabinski, Esq.